

ORIGINAL

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FILED
HARRISBURG, PA
JUN 10 2002

MARY E. D'ANDREA,
Per gls
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PENNSYLVANIA PROTECTION AND
ADVOCACY, INC.,

Plaintiff,

v.

DEPARTMENT OF PUBLIC WELFARE
OF THE COMMONWEALTH OF
PENNSYLVANIA; *et al.*,

Defendants.

Civil Action No. 1:00-CV-1582

Judge Caldwell ✓

**EXHIBIT A IN SUPPORT OF REPLY BRIEF IN
SUPPORT OF PLAINTIFF'S MOTION TO STRIKE CERTAIN
EXHIBITS TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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PENNSYLVANIA PROTECTION AND
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DEPARTMENT OF PUBLIC WELFARE :
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DECLARATION OF ROBERT W. MEEK

I, Robert W. Meek, declare as follows based on personal knowledge:

1. I am an attorney with the Disabilities Law Project ("DLP") and am lead counsel for Plaintiff in this lawsuit.


2. Defendants produced over 30,000 pages of documents in response to discovery requests.

3. Plaintiff specifically requested any documents relating to plans to develop community alternatives for persons who are unnecessarily institutionalized. In response to that document request, Defendants produced various e-mails, excerpts from meeting minutes, the June 2001 draft statewide plan, and documents relating to the closure of one of the units at SMRC and re-assignment of residents. To my knowledge, Defendants never produced in this case any documents relating to Marilyn Eckley's work on any plan to develop community alternatives for people who are unnecessarily institutionalized.

4. Although the parties agreed to delay any depositions of the expert witnesses in this case until after disposition of the summary judgment motions, there was no agreement that fact discovery would be similarly extended.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of June, 2002.


Robert W. Meek